

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**In re: Sara Davis Harman  
Debtor**

**CASE NO. 15-34112-KRH  
CHAPTER 13**

**AS PONTOS LLC  
Movant**

**v.**

**SARA DAVIS HARMAN and  
CARL M. BATES  
Respondents**

**DEBTOR'S OBJECTION TO NOTICE OF DEFAULT**

COMES NOW the Debtor, Sara Davis Harman ("Debtor"), by counsel, and objects to the Notice of Default filed by As Pontos, LLC ("Movant") as follows:

1. Debtor admits she was in default, but disputes the amount stated in Movant's Notice of Default.
2. Debtor asserts that she has cured the default.

WHEREFORE Sara Davis Harman, by counsel, requests that Movant withdraw the Notice of Default.

Respectfully Submitted,

**Sara Davis Harman**

By: /s/ Julia B. Adair  
Julia B. Adair (VSB #45130)  
Hathaway Adair, P.C.  
710 N. Hamilton Street  
Suite 200  
Richmond, VA 23221  
Counsel for Debtor

**CERTIFICATE OF SERVICE**

I hereby certify that on May 24, 2016, I served the foregoing Answer to Motion of Seterus, Inc. for Relief from Automatic Stay by electronic mail or first class mail, postage prepaid, to all necessary parties, including:

Andrew Todd Rich, Esquire  
BWW Law Group, LLC  
8100 Three Chopt Road, Suite 240  
Richmond, VA 23229

Carl M. Bates, Trustee  
P.O. Box 1819  
Richmond, VA 23218

Sara Davis Harman  
3216 Mountain Road  
Glen Allen, VA 23060

/s/ Julia B. Adair  
Counsel for Debtor